

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SPECTRUM DYNAMICS MEDICAL
LIMITED,

Plaintiff,

v.

GENERAL ELECTRIC COMPANY, GE
HEALTHCARE, INC., GE MEDICAL
SYSTEMS ISRAEL LTD., JEAN-PAUL
BOUHNİK, SERGIO STEINFELD, ARIE
ESCHO, NATHAN HERMONY, and YARON
HEFETZ,

Defendants.

Case No.: 18-cv-11386 (VSB)

**DECLARATION OF P. BRANKO
PEJIC IN SUPPORT OF PLAINTIFF
SPECTRUM DYNAMICS MEDICAL
LIMITED'S MEMORANDUM OF
LAW IN OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS IN PART PLAINTIFF'S
COMPULSORY COUNTERCLAIMS**

P. Branko Pejic, an attorney admitted pro hac vice in the Southern District of New York for purposes of this litigation, hereby declares the following under penalty of perjury:

1. I am a member of the bars of the District of Columbia and Arkansas. I was admitted pro hac vice before the Southern District of New York on December 20, 2018 [D.I. 8]. I am a lawyer at the law firm of Greenblum & Bernstein, P.L.C, attorneys for Plaintiff Spectrum Dynamics Medical Limited ("Plaintiff") in the above-captioned action. I submit this declaration in support of Plaintiff's Memorandum of Law in Opposition to Defendants' Motion to Dismiss In Part Plaintiff's Compulsory Counterclaims.

2. The purpose of this declaration is to provide the Court with documents supporting that memorandum.

3. A true and correct copy of the email exchange with Defendants' Counsel, Marla R. Butler, dated August 26, 2020, is attached hereto as **Exhibit A**.

4. A true and correct copy of the email exchange with Defendants' Counsel, Marla R. Butler, dated July 21, 2020, is attached hereto as **Exhibit B**.

5. A true and correct copy of the email exchange with Defendants' Counsel, Jesse Jenike-Godshalk, dated July 24, 2020, is attached hereto as **Exhibit C**.

6. A true and correct copy of the Property Rights Statement for U.S. Patent No. 9,402,595 (Hefetz Declaration), dated March 4, 2014, is attached hereto as **Exhibit D**.

7. A true and correct copy of the Property Rights Statement for U.S. Patent No. 9,182,507 (Hefetz Declaration), dated January 7, 2015, is attached hereto as **Exhibit E**.

8. A true and correct copy of the Property Rights Statement for U.S. Patent Publication No. 2011/0268339 (Hefetz Declaration), dated June 11, 2010, is attached hereto as **Exhibit F**.

9. A true and correct copy of the Property Rights Statement for U.S. Patent No. 9,072,441 (Hefetz Declaration), dated October 18, 2006, is attached hereto as **Exhibit G**.

10. A true and correct copy of the email exchange with GE Counsel, Marla R. Butler, dated August 14, 2020, is attached hereto as **Exhibit H**.

11. A true and correct copy of the Summons in a Civil Action issued to Yaron Hefetz and Waiver of Service, in the above-captioned action, dated August 11, 2020 [D.I. 97], is attached hereto as **Exhibit I**.

12. A true and correct copy of the email exchange with Defendants' Counsel, Jesse Jenike-Godshalk, dated September 9, 2020, is attached hereto as **Exhibit J**.

Dated: Reston, Virginia
September 23, 2020

By: 
P. Branko Pejic

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